

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

| | | |
|-----------------------------|---|---------------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| v. | § | CAUSE NO. 4:17-CR-9 |
| | § | Judge Crone |
| THEODORE WILLIAM TAYLOR (1) | § | |
| CHIA JEAN LEE (2) | § | |

EXPERT WITNESS NOTICE
UNDER FEDERAL RULES OF EVIDENCE 702 AND 703

The United States of America, by and through the undersigned Assistant United States Attorney, hereby notifies the Court and defense counsel of potential expert testimony that the Government may introduce at trial. The Government believes that the scientific, technical, and specialized knowledge conveyed by the testimony will assist the jury in understanding the evidence or determining a fact in issue during the trial. The Government may call the experts identified below.

1. Dr. Graves Owen is expected to testify about the standard of care and conduct applicable to professional medical practice, the nature and scope of legitimate medical purposes relating to the issuance of prescriptions for controlled substances, and related matters. Dr. Owen has testified as an expert witness in other federal criminal trials and his qualifications and opinions have been provided to defense counsel.

2. Dr. Timothy Munzing is expected to testify about the standard of care and conduct applicable to professional medical practice, the nature and scope of legitimate medical purposes relating to the issuance of prescriptions for controlled substances, and

related matters. Dr. Munzing has testified as an expert witness in other federal criminal trials and his qualifications and opinions have been provided to defense counsel.

3. Susannah Herkert, a representative of the Drug Enforcement Administration, is expected to testify about the methods employed by individuals engaged in the illegal diversion of controlled substances, the monetary value of illegally diverted controlled substances, “tools of the trade” used by individuals involved in the illegal diversion of controlled substances, common indicators and drug quantities associated with illegal distribution of diverted controlled substances, investigative techniques used to identify and combat the illicit diversion of controlled substances, the use, movement, and concealment of proceeds generated from such criminal activity, and related matters. Investigator Herkert has testified as an expert witness in other federal criminal trials and her qualifications and opinions have been provided to defense counsel.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/ Stevan A. Buys
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CERTIFICATE OF SERVICE

I certify that on September 24, 2018, a true and correct copy of the foregoing document was electronically filed and that counsel of record will receive a copy thereof via the District Clerk's CM/ECF system.

/s/ Stevan A. Buys

STEVAN A. BUYS